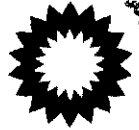




Todd L. Normane

Attorney  
BP Legal – Health, Safety & Environment

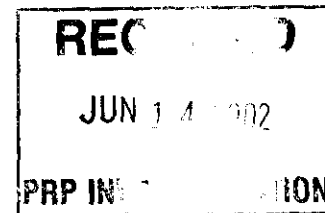
BP America Inc  
333 S. Hope Street  
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VIA UPS OVERNIGHT

June 13, 2002

Ms. Carlyn Winter Prisk  
3HS11  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029



RE: Lower Darby Creek Area Superfund Site  
Response to CERCLA Section 104(e) Request

Dear Ms. Prisk:

This letter constitutes Atlantic Richfield Company's ("Atlantic Richfield") response ("Response") to the United States Environmental Protection Agency's ("EPA") letter and request for information dated February 19, 2002 ("RFI"), which seeks information regarding the Lower Darby Creek Area Superfund Site ("Site"), pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act.

EPA claims that it "has reason to believe that wastes generated at locations owned or operated by Atlantic Richfield Company ("ARCO") may have been transported to and disposed of at the Site." EPA has supplied no evidence that supports this allegation nor any basis whatsoever to support its "reason to believe."

Notwithstanding the absence of any evidence that demonstrate any nexus to the Site, Atlantic Richfield submits this response to the RFI in good faith and reserves all rights to dispute any and all claims made by the EPA, with no stated or implied waiver of any of Atlantic Richfield's rights, remedies or defenses in this matter. Atlantic Richfield reserves its right to challenge EPA's authority to request information in this manner in general and will reserve its objections as stated below. This response does not constitute, and should not be construed as, an admission of liability by Atlantic Richfield for any of the claims, demands, causes of action, releases or violations set forth in the RFI.

### **General Objections**

Atlantic Richfield objects generally to the overbroad, vague and unduly burdensome requests for documents and information. Atlantic Richfield further objects to the RFI as overbroad and unduly burdensome in that it seeks documents and information that pertain to a time period of more than 26 to 44 years ago.

Atlantic Richfield objects to the RFI to the extent that it seeks information beyond the scope of the statutory authorities cited or is protected by the attorney-client privilege, the attorney work product doctrine, or any other privilege. Atlantic Richfield also objects to the RFI as overbroad and unduly burdensome insofar as it seeks copies of documents that are in the public domain, including documents in the files of any branch of the U.S. government, state government, or any local government.

This Response does not constitute, and should not be construed as an admission of liability by Atlantic Richfield for any claims, demands, causes of action, releases or alleged violations set forth in the RFI.

### **Specific Objections**

Atlantic Richfield objects to EPA's overly broad and vague reference to "locations owned or operated by Atlantic Richfield Company," "establishment(s)" and "arrangement." Atlantic Richfield further objects to the overly broad and vague reference to "facilities in the Philadelphia, Pennsylvania area." The use of broad and vague terms to identify the scope of EPA's inquiry demonstrates that there is no evidence to support the allegation that "EPA has reason to believe that wastes generated at locations owned or operated by Atlantic Richfield Company ("ARCO") may have been transported to and disposed of at the Site." EPA has not provided any information or scope of references that would assist Atlantic Richfield in a search of its records.

Nonetheless, EPA demands that Atlantic Richfield conduct an exhaustive search of its records regarding an unidentified and unknown scope of facilities that may have been in operation no earlier than 26 years ago and as far back as 44 years ago. This request for information is unduly burdensome, overbroad and objectionable when the basis for the initial speculation is remote and ambiguous at best.

Atlantic Richfield objects to the vague and ambiguous definition of "arrangement" in the RFI.

Notwithstanding the above general and specific objections, Atlantic Richfield has made a good faith effort to locate all responsive documents and information, within its possession, custody and control that address matters related to the Lower Darby Creek Area Superfund Site. This Response represents Atlantic Richfield's understanding of the inquiry as of this date. Atlantic Richfield reserves the right to supplement this Response should additional information become

available in the future. Subject to the foregoing general and specific objections, Atlantic Richfield responds as follows.

**Response to Request**

1. *State the name of your company, its mailing address, and telephone number. Further identify:*
  - a. *The dates and states of incorporation of your company;*
  - b. *The date and original state of incorporation of your company; and*
  - c. *The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.*

**Response to Question No. 1**

Subject to the general and specific objections above, and without waiver of these objections, Atlantic Richfield responds as follows.

Atlantic Richfield Company; Principal Operating Office located at 200 East Randolph Drive, Chicago, Illinois 60601. Please direct all correspondence and contacts to Atlantic Richfield Company c/o Todd L. Normane, Esq., BP Legal – Western Region, 333 South Hope Street, Los Angeles, California 90071, (213) 486-0806.

- a. March 14, 1985, Delaware.
  - b. On April 29, 1870, the Atlantic Refining Company was incorporated under the laws of the State of Pennsylvania. On January 3, 1966, Richfield Oil Corporation, incorporated in Delaware on November 14, 1936, merged into Atlantic Refining Company. On May 3, 1966, the Atlantic Refining Company changed its name to Atlantic Richfield Company. On May 7, 1985, Atlantic Richfield Company, a Pennsylvania corporation, merged into Atlantic Richfield Delaware Corporation, incorporated in Delaware on March 14, 1985, and changed its name to Atlantic Richfield Company.
  - c. BP America Inc. See also, Response 1(b) above. Various other companies and operations have been added to or divested from Atlantic Richfield and its predecessors.
- 
2. *What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.*

**Response to Question No. 2**

Subject to the general and specific objections above, and without waiver of these objections, and upon information and belief, Atlantic Richfield responds as follows.

Atlantic Richfield owned and operated its Philadelphia Refinery, located at 3144 Passyunk Avenue, Philadelphia, PA, between 1958 and 1976. In September, 1985, Atlantic Richfield sold its Philadelphia Refinery to Atlantic Petroleum Corporation. In 1988, Sun Company, Inc. acquired Atlantic Petroleum Corporation, and Atlantic Refining and Marketing Company. Sun owned Atlantic Richfield's former Philadelphia Refinery (now known as Point Breeze Processing Area) through its subsidiary, Atlantic Refining and Marketing, and operated it through its subsidiary, Sun Company, Inc., Refining and Marketing. In addition, Atlantic Richfield Company and its affiliated entities owned, operated and/or had contractual relationships with owners or operators of retail gasoline service stations and terminal distribution facilities in Pennsylvania, New Jersey and Delaware during the relevant time period.

3. *Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.*

**Response to Question No. 3**

In addition to the general and specific objections given above, Atlantic Richfield further objects to this Question as unduly burdensome, oppressive and vague regarding the nature of the Atlantic Richfield's employees and the employees' knowledge of relevant matters. Atlantic Richfield does not compile nor maintain lists of past or present employees in any such fashion. Subject to these objections, and without waiver of these objections, Atlantic Richfield responds as follows.

Atlantic Richfield has conducted a diligent search of its records and has not found any documents responsive to this Question. Should Atlantic Richfield find documents responsive to this Question subsequent to the date of this Response, Atlantic Richfield will provide such documents to EPA.

4. *Identify the owners and operators of your establishment(s) in Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:*

- a. *The dates of their operation;*
- b. *The nature of their operation; and*
- c. *All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).*

**Response to Question No. 4**

In addition to the general and specific objections above, and without waiver of these objections, Atlantic Richfield and its affiliated entities had a significant number of gasoline service station and distribution facilities in Pennsylvania, New Jersey and Delaware that may have been in operation during the relevant time span of 45 years, which have no relation or relevancy to the present matter. EPA asks Atlantic Richfield to engage in an overly broad and burdensome exercise to provide information that will not further EPA's inquiry regarding the Site. As stated above, this request for information is even more objectionable when the basis for the initial speculation is remote and ambiguous at best. Subject to these objections, and without waiver of these objections, Atlantic Richfield responds as follows.

- a. See Response to Question 2 above.
- b. See Response to Question 2 above.
- c. Atlantic Richfield has conducted a diligent search of its records and has not found any information or documents relating to the Site. As EPA has provided no basis to support or suggest that "EPA has reason to believe that wastes generated at locations owned or operated by Atlantic Richfield Company ("ARCO") may have been transported to and disposed of at the Site," a speculative search for the requested information and documents would be unduly burdensome. The RFI seeks "information concerning the release, or threat of release, of hazardous substances, pollutants or contaminants into the environment" at the Site. Atlantic Richfield has conducted a diligent search of its records and has not found any information or documents regarding disposal of any materials at the Site. Indeed, Atlantic Richfield has not found any information or documents relating to the Site at all. Should Atlantic Richfield find such documents subsequent to the date of this Response, Atlantic Richfield will provide such documents to EPA.

5. *Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.*

- a. *Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;*
- b. *Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes, and*
- c. *Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.*

**Response to Question No. 5**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See Response to Question 4 above.

- 6. *Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:*
  - a. *The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;*
  - b. *The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;*
  - c. *The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;*
  - d. *The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;*
  - e. *The types and sizes of containers in which these substances were transported and stored; and*
  - f. *The persons or companies that supplied each such hazardous substance to your company.*

**Response to Question No. 6**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 4 above.

7. *Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:*
  - a. *The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;*
  - b. *The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;*
  - c. *The annual quantities of each such by-product and waste generated stored, transported, treated, disposed of, released, or otherwise handled;*
  - d. *The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;*
  - e. *The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and*
  - f. *The location and method of treatment and/or disposal of each such by-product or waste.*

**Response to Question No. 7**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 4 above.

8. *Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckley Trash Hauling, Barratt Ruppert, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc., Gene Banta Trash Removal, and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:*

- a. *The person with whom you made such a contract or arrangement;*
- b. *The date(s) on which or time period during which such material was removed or transported for disposal;*
- c. *The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);*
- d. *The annual quantity (number of loads, gallons, drums) of such material;*
- e. *The manner in which such material was containerised for shipment or disposal;*
- f. *The location to which such material was transported for disposal;*
- g. *The person(s) who selected the location to which such material was transported for disposal;*
- h. *The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and*
- i. *Any billing information and documents (invoices, trip tickets, manifest, etc.) in your possession regarding arrangements made to remove or transport such material.*

**Response to Question No. 8.**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 4 above.

- 9. *Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:*
  - a. *Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;*
  - b. *Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or*
  - c. *Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex, or other areas of the Site (either directly or through transshipment points) for disposal or treatment.*



**Response to Question No. 9.**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 3 above.

10. *For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:*
- a. *The date(s) on which such material was disposed of or treated at the Site;*
  - b. *The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);*
  - c. *The annual quantity (number of loads, gallons, drums) of such material;*
  - d. *The specific location on the Site where such material was disposed of or treated; and*
  - e. *Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.*

**Response To Question No. 10.**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 4 above.

11. *Did your establishment(s) or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:*
- a. *The date(s) of the spill(s)/release(s) occurred;*
  - b. *The composition (i.e., chemical analysis) of the materials which were spilled/released;*
  - c. *The response made by you or on your behalf with respect to the spill(s)/release(s); and*
  - d. *The packaging, transportation, and final disposition of the materials which were spilled/released.*

**Response to Question No. 11.**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 4 above.

12. *Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answers to question 3, so indicate.*

**Response to Question No. 12.**

Subject to its general and specific objections and without waiver of its objections, Atlantic Richfield responds as follows: See the Response to Question 3 above.

13. *Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.*

**Response to Question No. 13.**

Subject to the general and specific objections above, and without waiver of these objections, Atlantic Richfield responds as follows.

Atlantic Richfield has conducted a diligent search of its records and has not found any documents responsive to this Question. Should Atlantic Richfield find documents responsive to this Question subsequent to the date of this Response, Atlantic Richfield will provide such documents to EPA.

14. *If you have any information about other parties who may have information that may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the*

*reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.*

**Response to Question No. 14.**

Subject to the general and specific objections above, and without waiver of these objections, Atlantic Richfield responds as follows.

Atlantic Richfield has conducted a diligent search of its records and has not found any documents responsive to this Question. Should Atlantic Richfield find documents responsive to this Question subsequent to the date of this Response, Atlantic Richfield will provide such documents to EPA.

*15. Representative of your establishment(s):*

- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to Atlantic Richfield.*
- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.*

**Response to Question No. 15.**

Subject to the general and specific objections above, and without waiver of these objections, Atlantic Richfield responds as follows.

- a. Todd L. Normane, Esq.; BP Legal – Western Region, 333 South Hope Street; 2032, Los Angeles, California 90071, (213) 486-0806; attorney for Atlantic Richfield Company.*
- b. See Response 15(a) above.*

*16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:*

- a. Your document retention policy;*
- b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;*

- c. *A description of the type of information that would have been contained in the documents; and*
- d. *The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.*

**Response to Question No. 16.**

Subject to the general and specific objections above, and without waiver of these objections, and upon information and belief, Atlantic Richfield responds as follows.

- a. The Atlantic Richfield Records Retention Policy is enclosed and labelled, "Response to Question 16(a)."
- b.-d. In addition to the general and specific objections above, and without waiver of these objections, Atlantic Richfield and its affiliated entities had a significant number of gasoline service station and distribution facilities in Pennsylvania, New Jersey and Delaware that may have been in operation during the relevant time period of 26 to 44 years ago that have no relation or relevancy to the present matter. EPA asks Atlantic Richfield to engage in an overly broad and burdensome exercise to provide information regarding the record retention history for this volume of sites that will not further EPA's inquiry regarding the Site. As stated above, this request is even more objectionable when the basis for the initial speculation is remote and ambiguous at best.

Atlantic Richfield has conducted a diligent search of its records and has not found any documents responsive to the RFI. It does not appear that there are records responsive to the RFI that are either not available or destroyed. Should Atlantic Richfield find documents responsive to the RFI subsequent to the date of this Response, Atlantic Richfield will provide such documents to EPA.

Sincerely,



Todd L. Normane  
Counsel for Atlantic Richfield Company

Cc: Walter Hufford (w/ Encl.)

# ATLANTIC RICHFIELD COMPANY

Atlantic Richfield Company  
Response to Question 15(a)

## 2000 RECORDS RETENTION POLICY

### AND STANDARD RECORD SERIES GUIDELINES

The Atlantic Richfield Company is concerned with the efficient and economical management of company records. It is the policy of the company to retain records only for the minimum time necessary to conduct its business and to satisfy legal and regulatory requirements.

By application of this policy and the attached Standard Record Series guidelines, the company expects to ensure compliance with existing state and federal legal requirements relating to records retention, with discovery requirements related to litigation, government investigation or audit, and ensure the availability of records to those who have legitimate needs for the requisite period of time.

Effective April 2000, this 2000 Records Retention Policy Standard Record Series Guidelines ("2000 Policy") shall apply to all Los Angeles basin companies and shall govern all retention decisions. The 2000 Policy supersedes all procedures for records retention previously issued.

## General Policy

*Company records are the property of the company and not the author or custodian of those records. No employee has any personal or property right to the records of the company, including those records that the employee helped develop or compile.*

It is the general policy of the Atlantic Richfield Company to manage its records in a manner consistent with the following principles:

- \* Create only those records that are needed for the operation of the company.
- \* Utilize records management technologies such as microfilm and electronic imaging systems for appropriate applications.
- \* Comply with prevailing state, federal and international legal requirements relating to record retention including legal requirements related to litigation, government investigation and audit.
- \* Retain records only for the period of time established by the approved Records Retention Guidelines.
- \* Destroy records whose retention period has expired and that are no longer needed for approved purposes.

## Official and Unofficial Records

The Standard Record Series guidelines include retention periods for Official Records and Unofficial Records. The following definitions apply:

*Record.* Any form of recorded information created or maintained for use at a later time, including paper, microfilm, microfiche, photograph, map, computer disk or tape, software, video, or other recorded information originated or received by the corporation for the conduct of business operations and activities.

*Official Record.* The version of a record that must be retained for the Official Retention Period. Typically, a group, department or office in the organization is responsible for maintaining or archiving the Official Record. Note: if the official record has been migrated to microfilm, microfiche, machine readable tape,

disk or software, such media can be used to retain the official record. In such a case, the hard copy version is an unofficial record.

*Official Retention Period.* The time period for which the Official Record must be maintained.


*Unofficial Record.* Any duplicate copies, reference materials, etc., regardless of format, that are for convenience or reference purposes and are not designated Official Records. Examples include blank forms, magazines, newspapers and distributed copies of bulletins and circulars. Chron files are considered to be duplicate copies and should not be archived unless it is the only filing system maintained by a department. Departmental copies of personnel files, expense reports, etc. are also unofficial records that should not be archived.

*Unofficial Retention Period.* Unofficial Records are not required to be maintained, unless they have been put on legal or tax hold. The Unofficial Retention Period identifies a maximum time period for retaining such records.

## Legal and Tax Holds

Any box that is to be archived that contains records that must be retained due to a legal matter or tax audit should be placed on "Hold" so that it will not be destroyed at the end of its retention period. This includes records that have been searched for legal matters and records pertaining to reasonably foreseeable future litigation. The Legal and Tax departments are responsible for providing Records Management with a list of which boxes must be placed on Hold, as well as the reason for the Hold. Tax and Legal must also notify Records Management when a Hold is no longer required.

For further instructions in the application of the Standard Record Series guidelines, contact Records Administration. For additional information regarding Holds, contact the Legal Department.

|   |                               |                   |                        |                       |                |                         |        |
|---|-------------------------------|-------------------|------------------------|-----------------------|----------------|-------------------------|--------|
|  | <u>By Status</u>              | <u>By Contact</u> | <u>By Schedule No.</u> | <u>By Cost Center</u> | <u>By Date</u> | <u>By Reference No.</u> | (HELP) |
|   | <u>Record Series Category</u> |                   |                        |                       |                |                         |        |

| Series Code     | Categories/Subjects  | Description   | Unofficial Ret | Official Ret | Class ID |
|-----------------|--|---|----------------|--------------|----------|
| ▼ Environmental |  |   |                |              |          |
| ENV             | Environment  | Records related to environment activities   | MAXACT         | IND          | 554      |
| ENV-10          | Environment Auditing / Programs                                | Records related to environmental auditing procedures and requirements.  | MAXACT         | IND          | 555      |
| ENV-10-04       | Environment Auditing / Programs Environmental Auditing         | Records documenting compliance with established auditing procedures and environmental pollution requirements. | MAX1           | 10           | 556      |
| ENV-10-06       | Environment Auditing / Programs Environmental Reference Manual | Records documenting procedures related to environmental issues.   | MAXACT         | IND          | 557      |
| ENV-10-08       | Environment Remediation  | Reports, Invoices, and related environmental remediation issue  | MAX1           | 10           | 558      |
| ENV-10-10       | Environment Auditing / Programs Testing Methodology            | Records documenting procedures for environmental testing.   | MAXACT         | IND          | 559      |
| ENV-10-12       | Environment Auditing / Programs Testing Worksheets             | Records completed during environmental testing.   | MAX1           | 10           | 560      |
| ENV-20          | Environment Hazardous Substances                               | Records related to hazardous substances.  | MAXACT         | IND          | 561      |
| ENV-20-02       | Environment Hazardous Substances Disposal Records              | Records related to the disposal of hazardous substances   | MAXACT         | IND          | 12       |
| ENV-20-04       | Environment Hazardous Substances Transportation Records        | Records related to the transportation of hazardous substances.  | MAX1           | IND          | 562      |
| ENV-30          | Environment Reporting  | Records submitted to government agencies documenting the environmental test results.                          | MAX1           | 10           | 563      |
| ENV-40          | Environment Water Pollution                                    | Records related to water pollution.   | MAX1           | 5            | 564      |
| ENV-50          | Environment Air Pollution                                      | Records related to air pollution.   | MAX1           | 5            | 565      |
| ENV-50-10       | Environment Air Pollution Air Pollution Testing Records        | Records documenting testing for pollution in the air.   | MAX1           | 5            | 566      |
| ENV-90          | Environment General  | Records related to environmental issues not covered elsewhere.  | MAX1           | 3            | 567      |